

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BETHANY KATZ,

Plaintiff,

v.

DNC SERVICES CORP. d/b/a
DEMOCRATIC NATIONAL
COMMITTEE., *et al.*

Defendants.

Civil Action No. 16-5800

JOINT MOTION TO REPLACE CLAIMS ADMINISTRATOR

Plaintiffs, joined by Defendant, hereby move for an Order to replace Angeion Group, Inc. as the Claims Administrator in this Action. The Parties seek the Court appoint Simpluris, Inc. in Angeion's place. In support of this request, the Parties show as follows:

(1) On January 7, 2023, Plaintiffs filed their unopposed motion to preliminarily approve the class settlement. In the settlement agreement, the Parties selected Angeion Group to act as the Claims Administrator. *See* ECF Doc. 238-3 at 11.

(2) Due to the large number of payment distributions, and the number of years over which settlement members will be paid, claims administrators have provided significant variance in their bids to administer the Settlement.

(3) In early April, Plaintiffs received a proposal from Simpluris, Inc. that was significantly less than the price proposed by Angeion Group. Though price is not the sole criterion for selecting an appropriate administrator, Simpluris is a well-respected and competent administrator. *See* Declaration of Eric Springer, Director of Client Services for Simpluris, attached

as Exhibit A. Moreover, the difference in price between the two administrators will result in class members receiving an additional \$50-\$100 in their net settlement payments.

(4) For this reasons, the Parties respectfully request the Court enter an order appointing Simpluris to administer the settlement in this matter, consistent with the executed amendment to the Settlement Agreement Attached hereto.

WHEREFORE, Plaintiff respectfully prays this Court enters the Proposed Order replacing Angeion with Simpluris and approving the amended payment structure to the Claims Administrator.

Respectfully Submitted,

/s/ Justin Swidler

Justin L. Swidler, Esq.
SWARTZ SWIDLER LLC
9 Tanner St. Ste. 101
Haddonfield, NJ 08033
Tel: 856-685-7420
Fax: 856-685-7417
Email: jswidler@swartz-legal.com

/s Ben Stafford

Ben Stafford, Eq.
ELIAS LAW GROUP, LLP
1700 Seventh Ave., Ste. 2100
Seattle, WA 98101
bstafford@elias.law

Dated: April 18, 2023